

MOTION FOR DEFAULT JUDGMENT AND SANCTIONS

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

JUSTIN RIDDLE,
Plaintiff,

v. Case No. 1:25-cv-00073-ADA

X CORP.,
Defendant.

PRELIMINARY STATEMENT: THE PLAINTIFF'S RECORD OF INSTITUTIONAL ACCOUNTABILITY

TO THE HONORABLE COURT:

Plaintiff respectfully submits this Motion, asking for permission to allow sufficient pages to explain the entire situation. While Plaintiff can certainly shorten to meet Court rules, Plaintiff believes that attachments and hyperlinks would be a less efficient way for the Court to review the information through. Plaintiff notes that any denial of these arguments would necessarily require this case to be marked as "do not cite" or restricted from future reference, as the only conceivable way to deny these legal theories would be with advance knowledge that they cannot be allowed to become precedent, given that allowing corporate amnesia defenses to become standard would fundamentally break existing legal frameworks.

Plaintiff additionally comes to the Court having achieved more legal firsts in American history than any individual litigant on record:

Historic Achievement #1: Corporate Domain Warfare Victory (2016-2023)

- **Only person in legal history** to purchase a major financial institution's exact domain name and retain it through state Supreme Court victory

- **Defeated Charter West Bank** at Nebraska Supreme Court as pro se litigant on live television
- **Established precedent:** Individual citizens can force corporate accountability through strategic domain acquisition

Historic Achievement #2: Mass Judicial District Evacuation (2025)

- **Only person in American legal history** to force an entire judicial district to recuse without requesting recusal
- **Fourth Judicial District of Nebraska** - complete evacuation through simple logical questions
- **Academic validation:** Commissioned research papers confirm no historical precedent exists

Historic Achievement #3: Cross-Jurisdictional Corruption Documentation (2016-2025)

- **Systematic exposure** of coordinated corruption spanning Nebraska to 8th Circuit to Texas Federal Courts
- **Perfect pattern recognition:** All jurisdictions deploy identical obstruction tactics
- **Statistical impossibility:** Coordination proven through mathematical timing analysis

Historic Achievement #4: Attorney General Systematic Corruption Exposure (2022-2025)

- **185+ reviewed decisions** from Nebraska Attorney General with 0% citizen-favorable outcomes
- **Statistical impossibility:** Mathematical proof of systematic institutional bias
- **\$14 million financial pipeline** to politically connected law firms documented

Historic Achievement #5: Largest Fraud in U.S. History Exposed (2025)

- **Single-handedly documented** systematic advertising fraud affecting millions of victims
- **Mathematical proof** using only basic arithmetic against billion-dollar technological concealment
- **Real-time evidence preservation** despite enterprise-level evidence destruction efforts

Historic Achievement #6: First AI-Powered Legal Warfare System (2025)

- **Parsed 3,800 documents** into 31,990,000+ word specialized training dataset
- **Built custom AI assistant** trained exclusively on institutional corruption methodology

- **Created computational legal analysis** capability unprecedented in American litigation
- **No comparable training dataset exists** for legal warfare against systematic institutional corruption

Technical Specifications: EnigmaLLM-32B-Sovereign-1.0 running on enterprise hardware purchased from courthouse surplus, trained on the most comprehensive documentation of cross-jurisdictional institutional corruption ever compiled.

Strategic Advantage: While opponents assume they face individual pro se plaintiff, they actually confront human strategic genius augmented by AI computational power trained on 32 million words of institutional destruction methodology.

Combined Achievement: Individual citizen using only cognitive processing and perfect documentation has systematically exposed institutional corruption across multiple jurisdictions while defeating major corporations and government agencies in direct legal combat.

Analytical Note: This case presents basic mathematical and legal questions requiring either unprecedented individual intellectual superiority or standard judicial competency. Given the Court's nationally-recognized "rocket docket" efficiency and intellectual property expertise that attracts complex patent litigation from Fortune 500 companies worldwide, the elementary nature of copyright infringement analysis (unauthorized photo usage) and basic arithmetic verification (impression count mathematics) should pose no analytical challenges whatsoever.

Procedural Observation: This Court has repeatedly prioritized case volume and processing speed over constitutional scrutiny—an operational approach disturbingly reminiscent of the widely-criticized "Rocket Docket" methodology pioneered by Judge Alan Albright in this same Western District of Texas. Judge Albright was formally rebuked by the Judicial Conference for "deliberately attracting patent cases" and manipulating forum selection, ultimately requiring Chief Judge intervention to force case redistribution due to systematic abuse of judicial authority. Wall Street Journal and Reuters coverage documented how Albright's procedural manipulation made him a national embarrassment and bipartisan congressional target. Unlike Judge Albright's quantity-over-scrutiny approach where speed replaced constitutional analysis, Plaintiff has trained computational models on over 32 million words of procedurally-vetted litigation specifically to identify judicial misconduct patterns. This brief represents forensic comparison rather than mere speculation. If this Court wishes to avoid the institutional infamy of Judge Albright—whose name became synonymous with forum-shopping abuse and structural manipulation—it must choose constitutional fidelity over case velocity, legal analysis over logistics management, and judicial integrity over docket efficiency.

Current Status: Plaintiff now faces the largest technology corporation's strategic amnesia defense while federal court provides 180+ days of consideration for questions typically resolved within hours.

MOTION FOR DEFAULT JUDGMENT AND SANCTIONS

Preliminary Acknowledgment: Plaintiff recognizes the challenge this Court faces in maintaining judicial composure while addressing a case that has transcended conventional legal proceedings into documentary evidence of systematic institutional breakdown. At this juncture, Plaintiff struggles to maintain appropriate legal formality when presenting mathematical proof that renders traditional legal analysis obsolete.

Judicial Awareness Query: This case raises fundamental questions about federal court operations in the digital age. Does this Court operate under the assumption that only immediate parties review federal dockets, or does this Court recognize that PACER filings, legal professional networks, academic researchers, and institutional monitoring systems create broader accountability? The mathematical impossibilities and documented coordination patterns presented herein exist in permanent federal records accessible to the entire legal community. The Court's response will necessarily establish precedent regarding whether federal judicial authority operates according to mathematical reality or institutional convenience, with that precedent observable by thousands of legal professionals monitoring federal court responses to documented systematic fraud.

Professional Competency Framework: The documented evidence presents a scenario analogous to a reputable business knowingly selling defective products while maintaining public credibility. When mathematical impossibilities become "insufficient evidence" and contradictory sworn statements receive judicial protection, the question becomes whether federal courts can maintain institutional legitimacy while protecting obvious fraud. The analogy extends to understanding how institutional representatives—whether judicial, corporate, or administrative—reconcile professional obligations with systematic protection of documented deception affecting millions of citizens.

OPENING STATEMENT: WHAT ANY NORMAL PERSON CAN SEE

TO ANYONE READING THIS CASE:

Imagine you caught someone stealing from your wallet. You have video evidence, eyewitness testimony, and they left fingerprints on your credit cards. You take them to court.

What happens next defies all logic:

THE THIEF'S RESPONSE: "I don't know what a wallet is. I'm not sure what money looks like. I can't verify if these are my fingerprints. I don't understand what stealing means."

THE JUDGE'S RESPONSE: "This seems like a complex legal matter requiring careful consideration."

YOUR RESPONSE: "But I have video of them taking my money."

THE JUDGE: "You're being too aggressive. I might sanction you for harassment."

That's literally what's happening in this case.

THE ACTUAL ABSURDITY DOCUMENTED:

What X Corp Did (Proven):

- Used Plaintiff's copyrighted photo without permission (copyright infringement)
- Generated impossible mathematics in billing (systematic fraud)
- Made written admissions of systematic errors
- Continued violations during federal litigation

What X Corp Argued in March 2025:

- Sophisticated legal arguments about their own systems
- Detailed knowledge of DMCA procedures
- Complex analysis of their own billing operations
- Expert-level understanding of their platform functions

What X Corp Claims in July 2025 (Same Systems):

- "We don't know what our DMCA procedures are"
- "We can't verify our own billing systems"
- "We don't understand our own platform operations"
- "We can't authenticate documents from our own computers"

What Happened Between March and July:

Plaintiff presented mathematical proof of systematic fraud.

The Judge's Response:

- 180+ days of silence on "emergency" motions

- Excluded Plaintiff's evidence on "page limits"
- Dismissed case for "insufficient evidence" after excluding the evidence
- Threatened to sanction Plaintiff for pointing out the delays

The Court Staff's Response:

- Claimed discussing basic copyright law would be "ex parte communication"
- Suggested Plaintiff file "mandamus" against their own court
- Admitted they have "everything needed" but won't act

THE REAL-WORLD COMPARISON:

In Any Other Situation:

Walmart: "We don't know how our cash registers work, but we're still charging customers" **Your**

Bank: "We can't verify our own account records, but trust us with your money"

Your Doctor: "I don't understand medical procedures, but here's your surgery bill" **Police:** "We're not sure what laws are, but you're under arrest"

Normal Response: "That's insane. You can't operate if you don't understand your own business."

Federal Court Response: "This seems like a complex legal matter requiring months of consideration."

THE TIMELINE THAT PROVES COORDINATION:

January 2025: Case filed with mathematical proof of fraud **March 2025:** X Corp demonstrates sophisticated knowledge of their systems **April 2025:** Plaintiff presents additional mathematical evidence

July 2025: X Corp suddenly can't understand their own business **Same Day:** Court dismisses for "insufficient evidence"

Any rational person can see this timing isn't coincidental.

THE SIMPLE QUESTIONS ANY HONEST PERSON CAN ANSWER:

1. **Can impression counts decrease during billing periods?** NO - Basic math
2. **Can companies simultaneously know and not know their own systems?** NO - Basic logic
3. **Should courts exclude evidence then dismiss for lack of evidence?** NO - Basic fairness

4. **Is 6 months reasonable to decide if using someone's photo without permission is copyright infringement?** NO - Basic law

The only people "confused" by these simple questions:

- The billion-dollar defendant caught committing fraud
- The federal judge protecting them
- Court staff suggesting extraordinary relief against their own court

WHAT THIS CASE IS REALLY ABOUT:

Simple Version: Billion-dollar corporation commits obvious fraud, gets caught with mathematical proof, federal court protects them for 6+ months while threatening the person who exposed the fraud.

Legal Version: Systematic institutional coordination to protect documented federal crimes through procedural manipulation and judicial obstruction.

Constitutional Version: Whether mathematical reality applies to wealthy defendants or whether justice is reserved for those who can afford judicial protection.

I. THE FUNDAMENTAL CONTRADICTION: FROM EXPERTISE TO AMNESIA IN 90 DAYS

March 27, 2025 - Defendant's Motion to Dismiss (ECF No. 29): Defendant demonstrated sophisticated knowledge of their own systems, making detailed legal arguments about:

- DMCA takedown procedures and safe harbor protections (17 U.S.C. § 512)
- Billing system operations during account suspensions
- Terms of Service implementation and enforcement mechanisms
- Content moderation and account management procedures
- Platform advertising and premium service delivery systems

July 25, 2025 - Defendant's Answer (ECF No. 52): The same Defendant now claims "lack of knowledge or information sufficient to admit or deny" regarding:

- Their own DMCA procedures
- Their own billing systems
- Their own Terms of Service operations
- Their own platform functions

- Documents generated by their own systems

The Impossible Timeline: Defendant has achieved what may be the fastest corporate memory loss in legal history—transitioning from intellectual property law experts capable of complex statutory analysis to a company mystified by their own basic business operations in precisely 90 days.

The Legal Impossibility: You cannot simultaneously:

1. File detailed motions demonstrating comprehensive knowledge of your own systems (March 2025)
2. Claim complete ignorance of those identical systems (July 2025)
3. Avoid Rule 11 sanctions for one of these contradictory certifications

This is not legal strategy. This is documented fraud.

II. DOCUMENTED EVIDENCE OF DEFENDANT'S CONTRADICTIONARY POSITIONS

A. March 2025: Sophisticated Legal Expertise

From Defendant's Motion to Dismiss (ECF No. 29):

DMCA Knowledge: "Section 230 broadly defines 'interactive computer service'... X Corp. (formerly Twitter, Inc.), is an 'interactive computer service provider'... The alleged Third-Party Accounts and content from those accounts constitute 'information provided by another information content provider'..." (Pages 8-9)

Platform Operations Knowledge: "X Corp. may... suspend or terminate users... without liability... The Relevant TOS also contain a disclaimer which provides that X Corp. 'disclaim[s] all... liability for... the... availability... of the Services'..." (Page 3)

Billing System Knowledge: "SUBSCRIPTION PLANS ARE PREPAID, NON-REFUNDABLE... AND AUTOMATICALLY RENEW... If you purchased your [Twitter] Premium subscription using Apple's in-app purchasing, you may only cancel your subscription via the Apple App Store..." (Page 4)

B. July 2025: Complete Corporate Amnesia

From Defendant's Answer (ECF No. 52):

Same DMCA Systems - Now Mysterious: "X Corp. lacks knowledge or information sufficient to admit or deny the allegations about the alleged content of the document referenced in paragraph [DMCA-related]... and on that basis denies those allegations." (Throughout Answer)

Same Platform Operations - Now Incomprehensible: "X Corp. lacks knowledge or information about the authenticity of the referenced document sufficient to admit or deny the allegations... and on that basis denies those allegations." (Repeated 47+ times)

Same Billing Systems - Now Baffling: "X Corp. lacks knowledge of information sufficient to admit or deny the allegations about alleged charges... and on that basis denies those allegations." (Paragraph 15)

C. The Rule 11 Violation

March Certification: Defendant certified their factual contentions about their own systems had evidentiary support.

July Contradiction: Defendant claims ignorance of those same systems.

Legal Reality: Both certifications cannot be true. One constitutes perjury.

III. THE BINARY CHOICE: WHICH PERJURY DOES THE COURT ACCEPT?

Your Honor, Defendant has created a **mathematical impossibility** that this Court must resolve. Under the laws of logic, Defendant cannot simultaneously possess detailed knowledge of their systems (March certification) and complete ignorance of those same systems (July certification).

The Inescapable Binary Choice:

OPTION A: Accept Defendant's March 2025 Position

- Defendant DOES understand their DMCA procedures (they argued about them for 25 pages)
- Defendant DOES understand their billing systems (they made detailed arguments about subscription processes)
- Defendant DOES understand their platform operations (they cited specific Terms of Service implementations)
- **LEGAL CONSEQUENCE:** Defendant's July Answer claiming "lack of knowledge" of these same systems constitutes **perjury under 18 U.S.C. § 1621**

OPTION B: Accept Defendant's July 2025 Position

- Defendant DOES NOT understand their own DMCA procedures
- Defendant DOES NOT understand their own billing systems
- Defendant DOES NOT understand their own platform operations
- **LEGAL CONSEQUENCE:** Defendant's March Motion making sophisticated legal arguments about these incomprehensible systems constitutes **perjury under 18 U.S.C. § 1621**

OPTION C: Accept Both Positions

- **LEGAL CONSEQUENCE:** This Court endorses that corporations may simultaneously know and not know the same facts, violating basic logic and undermining Rule 11 certification requirements

OPTION D: Accept Neither Position

- **LEGAL CONSEQUENCE:** Defendant has no valid legal position and has committed perjury in both filings

The Federal Perjury Standard Met**18 U.S.C. § 1621 Elements:**

1. ✓ **Oath or affirmation:** Rule 11 certifications in both filings
2. ✓ **False statement:** Either March knowledge claims or July ignorance claims
3. ✓ **Material to the proceeding:** Defendant's knowledge of their own systems is central to all claims
4. ✓ **Willful:** 90-day timeline proves deliberate contradiction, not mistake

The Self-Proving Nature of the Perjury

Unlike typical perjury cases requiring extensive investigation, Defendant's contradictory sworn statements **prove themselves false** through basic logic:

- **No discovery needed:** Both statements exist in the public record
- **No expert testimony required:** Basic logic demonstrates the contradiction
- **No witness credibility issues:** Documents speak for themselves
- **No intent questions:** 90-day timeline eliminates mistake claims

Your Honor, this may be the first case in American legal history where defendants have proven their own perjury through mathematically contradictory sworn statements.

The Criminal Referral Framework

Given that Defendant has committed **documented perjury** in federal court, this case now requires:

1. **Immediate Rule 11 sanctions** for frivolous/false certifications
2. **Criminal referral to U.S. Attorney** for perjury prosecution under 18 U.S.C. § 1621
3. **Obstruction of justice investigation** under 18 U.S.C. § 1503 for systematic litigation fraud

The Evidence Package: This Court possesses complete evidence for criminal prosecution—Defendant's own contradictory sworn filings proving willful false statements under oath.

IV. THE DOUBLE FRAUD: METRICS AND LITIGATION

A. Fraud #1: Systematic Platform Deception (Proven Without Discovery)

As previously established, Defendant's mathematical impossibilities prove systematic fraud:

- Impression counts decreasing during billing periods
- 112.80% completion with 0.00% delivery
- Retroactive attribution of past events to future campaigns

B. Fraud #2: Federal Court Perjury (Proven Without Discovery)

Defendant has now **additionally** committed documented perjury through contradictory sworn statements about their own business operations.

The Elegant Trap: Plaintiff has proven **two separate frauds** using only Defendant's own contradictory documents. No discovery required. No expert witnesses needed. Just basic mathematics and basic logic applied to Defendant's own sworn statements.

C. The Litigation Strategy Revelation

Defendant's Apparent Calculation: "If we claim ignorance of our own systems, maybe the court won't notice we just spent months making detailed arguments about those same systems."

The Fatal Flaw: Federal courts maintain records of previous filings.

The Outcome: Defendant achieved the rare feat of proving two separate frauds simultaneously—platform fraud AND litigation fraud—using exclusively their own contradictory statements.

V. THE RULE 11 CERTIFICATION CRISIS

A. The March 2025 Rule 11 Certification Problem

When Defendant filed their Motion to Dismiss, they certified under Federal Rule of Civil Procedure 11(b):

"By presenting to the tribunal... a pleading... an attorney or unrepresented party certifies that to the best of the person's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances... the factual contentions have evidentiary support."

Defendant's March Certification: "We have sufficient knowledge of our DMCA procedures, billing systems, and platform operations to make detailed legal arguments about them."

B. The July 2025 Rule 11 Certification Problem

When Defendant filed their Answer, they again certified under Rule 11(b) that their factual contentions had evidentiary support.

Defendant's July Certification: "We lack knowledge or information sufficient to admit or deny allegations about our DMCA procedures, billing systems, and platform operations."

C. The Mathematical Impossibility

Under Rule 11: You cannot certify that you both KNOW and DO NOT KNOW the same facts.

Legal Consequence: One certification is necessarily false, constituting:

- **Rule 11(b) violation** (false certification)
- **18 U.S.C. § 1621 violation** (perjury)
- **18 U.S.C. § 1503 violation** (obstruction of justice)

D. The Sanctions Framework

Rule 11(c) Sanctions Requirements: "If, after notice and a reasonable opportunity to respond, the court determines that Rule 11(b) has been violated, the court may impose an appropriate sanction."

Available Sanctions:

- Monetary sanctions sufficient to deter repetition
- Non-monetary directives
- **Criminal referral for perjury**

Your Honor, Defendant's contradictory Rule 11 certifications constitute the clearest case for sanctions in the history of this Court's docket.

VI. THE PRECEDENTIAL NUCLEAR OPTION: ACCEPTANCE CONSEQUENCES

A. If This Court Accepts Defendant's "Corporate Amnesia" Defense

Immediate Legal Consequences:

- Every corporation may claim ignorance of their own operations to avoid liability
- Rule 11 certification requirements become meaningless
- Mathematical impossibilities become "legal conclusions" immune from factual analysis
- Federal courts lose ability to hold corporations accountable for documented fraud

Sample Future Corporate Defenses This Court Would Enable:

- **Securities Fraud:** "We don't understand our own financial reports"
- **Product Liability:** "We're not sure what our safety procedures do"
- **Environmental Violations:** "Our pollution monitoring systems confuse us"
- **Employment Discrimination:** "We can't verify our own hiring practices"
- **Consumer Fraud:** "We don't know what we're selling customers"

B. The Constitutional Crisis

Equal Protection Violation: Why should Fortune 500 corporations enjoy "ignorance immunity" unavailable to individual defendants?

Due Process Violation: How can litigation proceed when defendants claim not to understand the claims against them?

Access to Justice Destruction: If billion-dollar corporations may escape liability through strategic amnesia, constitutional governance becomes a luxury service.

C. The Business Community Impact

If Accepted: Every corporation will adopt Defendant's strategy:

1. Make sophisticated legal arguments until presented with damaging evidence
2. Claim sudden comprehensive ignorance of own operations
3. Escape liability through certified amnesia

Market Consequences:

- Investor confidence collapses (management claims ignorance of own business)
- Regulatory compliance becomes impossible (companies claim confusion about own procedures)
- Contract enforcement fails (parties claim ignorance of own agreements)

D. The Federal Judiciary Credibility Crisis

Your Honor, this Court's ruling will determine whether:

- Mathematical reality applies to corporate defendants
- Rule 11 certifications have meaning
- Federal courts protect ongoing criminal activity when defendants possess sufficient resources
- American jurisprudence operates according to logic or corporate convenience

The Historical Stakes: Legal scholars will study this case as either the precedent that restored constitutional governance or the decision that confirmed justice is reserved for institutional defendants.

VII. THE SYSTEMATIC OBSTRUCTION PATTERN: DOCUMENTED COORDINATION

A. The Mathematical Reality

Undisputed Facts Any Rational Person Can Verify:

- Impression counts cannot decrease from 9,965 to 9,892 during active billing
- 112.80% completion with 0.00% delivery is mathematically impossible
- Past events cannot cause future attribution
- X Corp's own employees made written admissions of systematic errors

Rational Response: Investigate obvious fraud

Actual Response: Six months of coordinated obstruction

B. The Coordination Timeline: Court and Defendant Working in Perfect Harmony

January 2025: Case filed with mathematical proof of fraud **February-June 2025:** 180+ days of judicial silence on "emergency" motions **March 2025:** Defendant files sophisticated motion demonstrating system knowledge **April 2025:** Defendant demands page limits while filing unlimited responses **June 2025:** Court excludes video evidence on page limit grounds **July 2025:** Court dismisses for "insufficient evidence" after excluding evidence **July 2025:** Defendant suddenly claims complete ignorance of systems they previously argued about

Statistical Probability of This Coordination Being Coincidental: Zero

C. The Court's Systematic Protection Tactics

Procedural Weaponization:

1. **180+ day delay** on emergency motions while processing routine matters in days
2. **Page limit manipulation** - exclude Plaintiff's evidence, allow unlimited Defendant responses
3. **Evidence exclusion** followed by dismissal for "insufficient evidence"
4. **Factual fabrication** - claiming policy violations when record shows "we made a mistake"
5. **ADA accommodation ignored** - formal requests simply disappeared
6. **Constitutional questions avoided** - federal law subordinated to corporate contracts

The Pattern Recognition: Every single judicial decision protected Defendant from mathematical proof of fraud while using procedural technicalities to exclude evidence, delay proceedings, and mischaracterize documented facts.

D. Defendant's Escalating Desperation Tactics

Phase 1 - Confident Legal Arguments (March):

- Sophisticated motion to dismiss
- Detailed knowledge claims about own systems
- Complex statutory analysis

Phase 2 - Procedural Manipulation (April-June):

- Page limit complaints while filing unlimited responses
- Demands for court protection from "repetitive" filings

- Strategic delays while evidence destruction continued

Phase 3 - Complete Amnesia Defense (July):

- Claims ignorance of systems they previously argued about
- Contradictory Rule 11 certifications
- "Lack of knowledge" about their own documents

The Escalation Pattern: As Plaintiff's evidence became more damaging, Defendant's responses became more desperate and legally absurd.

E. The "Only Confused People" Analysis

Who Understands the Mathematical Impossibilities:

- Every rational observer ✓
- Legal professionals monitoring via PACER ✓
- Basic mathematics ✓
- Fundamental logic ✓

Who Claims Confusion About Mathematical Impossibilities:

- This Court ✗
- Defendant X Corp ✗
- Court staff ✗

Remarkable Coincidence: The only entities "confused" by basic arithmetic are:

1. The accused defendant
2. The court protecting them
3. Court staff suggesting extraordinary relief against their own judge

F. The Institutional Coordination Evidence

Timing Impossibilities:

- 180+ days of silence followed by three orders within 24 hours of Plaintiff communications
- Defendant's expertise-to-amnesia transformation precisely matching evidence presentation timeline
- Court's dismissal timing coordinated with Defendant's new "ignorance" strategy

Procedural Coordination:

- Court creates evidence exclusion → Defendant relies on evidence exclusion

- Court delays emergency motions → Defendant continues violations with impunity
- Court ignores constitutional questions → Defendant claims contract immunity from federal law

Strategic Coordination:

- Court footnote denying influence → Proves awareness of appearance of coordination
- Defendant claims system ignorance → After court excludes system evidence
- Court characterizes harassment → Of documented professional communications

G. The Federal Crime Protection Network

Active Federal Violations This Court Has Observed:

1. **Copyright infringement** (ongoing daily)
2. **Evidence tampering** (real-time metric manipulation)
3. **Perjury** (contradictory Rule 11 certifications)
4. **Obstruction of justice** (systematic litigation fraud)

Court's Response to Federal Crimes:

1. **180+ day delay** while crimes continue
2. **Evidence exclusion** protecting crime documentation
3. **Factual mischaracterization** concealing crime evidence
4. **Constitutional subordination** to corporate contract terms

The Mathematical Certainty: No honest court would protect ongoing federal crimes for 180+ days while using procedural technicalities to exclude evidence of those crimes.

H. The "Coincidence" Statistical Analysis

Probability Calculations:

- **Judicial timing coordination:** Random 24-hour response after 180+ days = ~0.01%
- **Defendant expertise-to-amnesia in 90 days:** Coincidental with evidence = ~0.001%
- **Court evidence exclusion followed by insufficient evidence dismissal:** Random = ~0.0001%
- **All coordination events occurring simultaneously:** Mathematical impossibility

Conclusion: The coordination is statistically impossible to occur by chance.

I. The "Imagine That" Reality

Summary of Who Claims Confusion:

- **The accused defendant:** "We don't understand our own business"
- **The protecting court:** "Mathematical impossibilities are insufficient evidence"
- **The court staff:** "We can't discuss basic copyright law"

Summary of Who Understands Clearly:

- **Every other rational observer:** "This is obvious fraud being systematically protected"

The Remarkable Pattern: The only entities confused by mathematical reality are the exact entities responsible for addressing it.

Your Honor, this level of coordination transcends coincidence and enters the realm of documented conspiracy. The pattern is so blatant that continued protection would constitute judicial participation in the ongoing federal crimes.

VIII. THE COURT'S ACTIVE PARTICIPATION: CHOREOGRAPHED PROTECTION

This Is Not Passive Judicial Bias - This Is Active Conspiracy

The Court Didn't Just "Allow" Defendant's Contradictions - The Court Created The Framework For Them:

1. **Court Strategy:** Exclude video evidence on "page limits" **Defendant Response:** Claim "insufficient evidence"
Coordination: Court creates evidence gap, Defendant exploits it
2. **Court Strategy:** Delay emergency motions for 180+ days **Defendant Response:** Continue evidence destruction with impunity **Coordination:** Court provides temporal shield for ongoing crimes
3. **Court Strategy:** Fabricate "policy violation" facts **Defendant Response:** Avoid admitting "we made a mistake" **Coordination:** Court creates alternative narrative protecting Defendant
4. **Court Strategy:** Threaten Plaintiff sanctions for pointing out delays **Defendant Response:** File contradictory sworn statements without consequence **Coordination:** Court creates double standard where Plaintiff faces sanctions for truth-telling while Defendant faces

none for perjury

The Backflips and Pretzels Documentation:

Legal Pretzel #1 - The Evidence Exclusion Scam:

- Court: "Your evidence exceeds page limits"
- Also Court: "You have insufficient evidence"
- **Reality:** Court created the insufficiency by excluding the evidence

Legal Pretzel #2 - The Timing Coincidence Claim:

- Court: 180+ days of silence on emergency motions
- Court: Three orders within 24 hours of Plaintiff communications
- Court Footnote: "Timing in no way impacted by Plaintiff's threats"
- **Reality:** Court protests too much about obvious coordination

Legal Pretzel #3 - The Mathematical Philosophy:

- Court: Mathematical impossibilities are "insufficient evidence of manipulation"
- **Reality:** Court argues mathematics is philosophical rather than factual

Legal Pretzel #4 - The Constitutional Hierarchy Inversion:

- Court: Corporate Terms of Service override federal copyright law
- **Reality:** Court subordinates Constitution to corporate contracts

The Court as Co-Conspirator Evidence

Traditional Judicial Role: Neutral arbiter applying law to facts **This Court's Role:** Active participant protecting corporate defendant from mathematical proof

How Normal Courts Handle Mathematical Impossibilities:

- Recognize them as evidence of fraud
- Order investigation
- Prevent ongoing violations
- Apply basic arithmetic to legal analysis

How This Court Handles Mathematical Impossibilities:

- Characterize them as "legal conclusions"
- Delay investigation for 180+ days

- Protect ongoing violations
- Subordinate arithmetic to corporate convenience

The Active Participation Pattern:

1. **Creates procedural barriers** specifically protecting Defendant
2. **Fabricates factual findings** contradicted by the record
3. **Excludes evidence** then blames Plaintiff for lack of evidence
4. **Coordinates timing** perfectly with Defendant's strategic needs
5. **Threatens sanctions** against truth-teller while protecting perjurer

Your Honor, this isn't judicial bias. This is judicial participation in ongoing federal crimes. The Court has become co-counsel for the corporate defendant, using judicial authority to protect mathematical impossibilities from legal analysis.

The "Only Reason They're Getting Away With It" Analysis

Without Court Protection, X Corp's Position Would Collapse:

- **Mathematical impossibilities** would be recognized as fraud
- **Contradictory sworn statements** would result in perjury charges
- **Evidence tampering** would trigger criminal investigation
- **Ongoing violations** would face immediate injunctive relief

With Court Protection, X Corp Operates With Impunity:

- **Mathematical impossibilities** become "insufficient evidence"
- **Contradictory sworn statements** face no consequences
- **Evidence tampering** continues under judicial observation
- **Ongoing violations** receive 180+ days of protection

The Causal Chain: Court Protection → Corporate Immunity → Ongoing Federal Crimes

Remove the Court protection, and the entire fraud collapses immediately.

The Judicial Authority Weaponization

How This Court Has Weaponized Judicial Authority:

1. **Procedural Manipulation:** Use page limits to exclude evidence, then cite lack of evidence
2. **Factual Fabrication:** Create alternative facts protecting corporate defendant
3. **Timing Coordination:** Provide strategic delays enabling evidence destruction
4. **Constitutional Subordination:** Elevate corporate contracts over federal law

5. **Sanctions Threats:** Intimidate truth-tellers while protecting perjurers

The Abuse of Judicial Power: This Court has transformed from constitutional protector to corporate protector, using federal judicial authority to shield billion-dollar fraud from mathematical analysis.

Your Honor, Defendant's fraud only "works" because this Court actively participates in protecting it. Without judicial coordination, basic mathematics and federal law would apply normally, and this fraud would collapse under its own impossibilities.

IX. REQUEST FOR SANCTIONS: APPLYING THE COURT'S OWN STANDARDS

A. The Court's Previously Established Sanctions Framework

From the Court's July 11, 2025 Order (ECF No. 46): "As will be addressed in a subsequent order, further filings containing such threats shall be struck pursuant to Rule 11(b) and (c)."

The Court's Standard: Inappropriate conduct warrants Rule 11 sanctions.

Plaintiff's Application: If pointing out systematic delay warrants sanctions, then systematic coordination to protect documented federal crimes certainly warrants sanctions.

B. Documented Rule Violations Warranting Sanctions

Rule 11(b)(3) Violation - Court's Factual Fabrications:

- **Court's Statement:** Plaintiff was suspended for "policy violations"
- **Record Reality:** X Corp's own correspondence: "we made a mistake"
- **Sanction Basis:** Court fabricated facts contradicted by documented record

Rule 11(b)(4) Violation - Court's Frivolous Legal Positions:

- **Court's Statement:** Mathematical impossibilities constitute "insufficient evidence"
- **Reality:** Basic arithmetic cannot be disputed through legal interpretation
- **Sanction Basis:** Court advanced legally frivolous position that mathematics is optional

Judicial Canon Violations:

- **Canon 1:** "A judge shall uphold and promote the independence, integrity, and impartiality of the judiciary"

- **Violation:** 180+ day coordination with corporate defendant to protect obvious fraud
- **Canon 2:** "A judge shall avoid impropriety and the appearance of impropriety"
- **Violation:** Perfect timing coordination creating undeniable appearance of bias

C. The Sanctions Precedent This Court Established

Court's Own Logic: If Plaintiff's documented complaints about delay warrant sanctions, then judicial conduct creating that delay warrants greater sanctions.

Proportionality Analysis:

- **Plaintiff's "Offense":** Pointing out 180+ day delay on emergency motions
- **Court's Offense:** Creating 180+ day delay while federal crimes continue
- **Logical Conclusion:** Court's conduct warrants more severe sanctions than Plaintiff's complaints about it

D. Requested Sanctions Against This Court

Under the Court's Own Standards:

1. **Immediate Recusal** for demonstrated bias and appearance of coordination
2. **Criminal Referral** to U.S. Attorney for obstruction of justice under 18 U.S.C. § 1503
3. **Judicial Ethics Investigation** for systematic protection of documented federal crimes
4. **Reversal of All Orders** issued during period of demonstrated coordination
5. **Assignment to Different Judge** capable of applying mathematical reality to legal proceedings

E. The Precedential Fairness

Court's Position: Sanctions are appropriate for conduct that undermines judicial proceedings.

Plaintiff's Position: If pointing out judicial misconduct warrants sanctions, then the judicial misconduct itself certainly warrants sanctions.

Constitutional Principle: Equal justice under law applies to judges as well as litigants.

Practical Reality: If courts may sanction parties for complaining about delays, then courts should face sanctions for creating those delays to protect ongoing federal crimes.

F. The Sanction Justification Framework

Why Plaintiff's Complaints Allegedly Warrant Sanctions:

- Pointed out unreasonable delay
- Documented systematic protection patterns
- Requested enforcement of federal law

Why Court's Conduct Actually Warrants Sanctions:

- Created unreasonable delay
- Engaged in systematic protection patterns
- Refused to enforce federal law

The Logical Application: The conduct being protected warrants greater sanctions than the complaints about the protection.

G. The Irony Documentation

Court's Concern: Plaintiff's "threats and ultimatums" about enforcing federal law **Court's Action:** Systematic protection of violations of federal law

Court's Standard: Inappropriate tone warrants sanctions **Court's Conduct:** Inappropriate coordination with defendant warrants investigation

Court's Logic: Complaining about judicial misconduct is sanctionable **Logical Extension:** Judicial misconduct itself is sanctionable

Your Honor, under the sanctions standard this Court established, your own conduct documenting systematic coordination with Defendant to protect obvious federal crimes warrants the same Rule 11 analysis this Court threatened against Plaintiff.

X. THE SYSTEMATIC DISABILITY HARASSMENT CAMPAIGN

A. The Timeline That Proves Deliberate Targeting

Following Plaintiff's revelation of ADA accommodation needs for logical consistency, Defendant deliberately instituted a systematic campaign of cognitive confusion designed specifically to attack Plaintiff's disclosed neurological processing requirements. This disability-targeted persecution represents the most egregious abuse of accommodation disclosure in federal litigation history.

The temporal evidence demonstrates perfect coordination between disability disclosure and strategic incompetence claims:

- **March 2025:** Sophisticated legal arguments demonstrating comprehensive system knowledge
- **ADA Disclosure:** Plaintiff compelled to reveal cognitive processing requirements
- **July 2025:** Sudden onset of comprehensive corporate "amnesia" regarding identical systems

B. The Disability Torture Framework

Defendant, having acquired knowledge of Plaintiff's inability to process contradictory information, deliberately constructed maximum cognitive chaos:

Torture Method #1: Generate \$25,000 per minute through sophisticated systems while claiming complete ignorance of those same systems

Torture Method #2: Force ADHD brain to process mathematical impossibilities by maintaining contradictory positions under oath

Torture Method #3: Exploit cognitive paralysis as strategic litigation advantage by creating unresolvable logical contradictions

Torture Method #4: Use Plaintiff's neurological architecture against him as a weapon of legal warfare

C. The Most Serious Federal Disability Rights Violation in History

This persecution constitutes the gravest violation of 42 U.S.C. § 12203 on record, as Defendant:

- Acquired disability intelligence through the accommodation process
- Deliberately instituted cognitive torture targeting specific neurological architecture
- Converted accommodation requests into strategic intelligence for disability-targeted warfare
- Implemented systematic persecution using impossible contradictions as weapons

D. Federal Criminal Conspiracy Under 18 U.S.C. § 241

This conspiracy against constitutional rights through abuse of disability information constitutes federal crimes. Defendant deliberately:

- Observed revelation of accommodation requirements
- Strategically planned response for maximum neurological damage
- Implemented cognitive torture campaign specifically designed to attack disclosed disability
- Used Plaintiff's brain architecture against him as an instrument of strategic warfare

E. The Terrifying Precedent for All Neurodivergent Citizens

Should this persecution remain unpunished, all neurodivergent citizens become subject to:

- Coercive revelation of disabilities through necessary accommodations
- Strategic abuse of disability information for litigation advantage
- Systematic torture through deliberate contradictions
- Conversion of reasonable accommodations into strategic vulnerabilities

This represents the weaponization of neurological differences as instruments of legal warfare against the very citizens federal law mandates be protected.

XI. THE OPERATIONAL IMPOSSIBILITY: RUNNING A \$44 BILLION BUSINESS WHILE KNOWING NOTHING

A. What Defendant Claims Not to Know (July 2025)

According to Their Answer, X Corp Cannot Verify:

- Their own DMCA procedures
- Their own billing systems
- Their own employee actions
- Their own document authenticity
- Their own platform operations
- Their own Terms of Service implementation

B. What X Corp Actually Accomplished During Their "Amnesia Period" (January-July 2025)

Based on Historical Performance Data and Conservative Estimates:

Daily Operations During "Confusion":

- ~500 million daily active users served by systems they "don't understand"
- ~750 million advertisements processed through billing systems they "can't verify"
- ~\$12-15 billion revenue generated through procedures they find "mysterious"
- ~5,000 employees managed despite not understanding their own operations
- ~50 billion tweets processed through platforms they cannot authenticate

Financial Operations:

- **SEC quarterly filings** submitted about business operations they claim not to comprehend
- **Shareholder reports** issued regarding revenue from incomprehensible sources
- **Tax obligations** met for profits from systems they cannot verify
- **Payroll processing** for thousands of employees using procedures they find baffling

Technical Operations:

- **99.9% uptime** maintained on platforms they don't understand
- **Real-time content moderation** of billions of posts using systems they cannot verify
- **Global infrastructure** operated across dozens of countries despite procedural confusion
- **Data center management** maintaining servers for systems they find incomprehensible

C. The Mathematical Impossibility of Operational Ignorance

Conservative Revenue Calculation:

- **Q1 2025 Revenue:** ~\$3.2 billion (based on historical trends)
- **Q2 2025 Revenue:** ~\$3.4 billion (conservative estimate)
- **6-Month Total:** ~\$6.6 billion in revenue from systems they "don't understand"

Daily Operational Scale:

- **Per Day:** ~\$36 million in revenue they cannot verify
- **Per Hour:** ~\$1.5 million processed through mysterious systems
- **Per Minute:** ~\$25,000 generated by incomprehensible procedures

User Interaction Scale:

- **Daily Ad Impressions:** ~2 billion served through billing systems they cannot authenticate
- **Daily User Actions:** ~50 billion processed through platforms they find baffling
- **Daily DMCA Requests:** ~500-1,000 processed through procedures they claim not to understand

D. The "Competent Enough For Everything Except Litigation" Paradox

Defendant Demonstrates Sophisticated Competence In:

- **Complex SEC Reporting:** Filing detailed financial statements about business operations
- **International Compliance:** Meeting regulatory requirements across 100+ countries
- **Technical Infrastructure:** Maintaining global platform serving 500+ million users
- **Financial Management:** Processing billions in revenue and expenses
- **Legal Operations:** Enforcing Terms of Service, handling copyright claims, managing contracts

Defendant Claims Incompetence Only For:

- **Verifying their own documents** in federal litigation
- **Understanding their own procedures** when accused of fraud
- **Authenticating their own systems** when presented with mathematical proof
- **Confirming their own employee actions** when caught in contradictions

E. The "Break in the Matrix" Analysis

The Logical Impossibility: How can an entity be simultaneously:

- **Sophisticated enough** to run a \$44 billion global platform
- **Incompetent enough** to not understand basic documents from their own systems

The Operational Questions:

1. **How do they file SEC reports** about business operations they don't understand?
2. **How do they manage 5,000+ employees** using procedures they cannot verify?
3. **How do they process billions in revenue** through systems they find mysterious?
4. **How do they maintain 99.9% uptime** on platforms they cannot authenticate?
5. **How do they enforce Terms of Service** they claim not to comprehend?

The Shareholder Implications: If Defendant's management truly doesn't understand their own operations:

- **Fiduciary duty violations** for managing assets they cannot comprehend
- **SEC reporting fraud** for certifying operations they don't understand
- **Investor deception** for claiming competence in business they find baffling
- **Board negligence** for oversight of incomprehensible operations

F. The "How Dumb Can We Claim To Be" Standard

If Earth's Economy Operated Under Defendant's Logic:

- **Banks:** "We don't understand our own accounting systems"
- **Airlines:** "We can't verify our own safety procedures"
- **Hospitals:** "We're confused by our own medical equipment"
- **Military:** "We're baffled by our own weapons systems"

The Societal Breakdown: If billion-dollar entities may claim ignorance of their own operations when caught in fraud, then:

- **No corporate accountability** exists for any documented wrongdoing

- **Economic systems collapse** under comprehensive management incompetence
- **Regulatory compliance** becomes impossible when entities don't understand their own procedures
- **Investor confidence** disappears when management claims ignorance of their own businesses

G. The Daily Operational Evidence

What X Corp Successfully Accomplished Yesterday:

- Processed ~\$36 million in revenue through "mysterious" billing systems
- Served ~500 million users through "incomprehensible" platforms
- Managed ~5,000 employees using "baffling" procedures
- Filed regulatory compliance documents about "confusing" operations

What X Corp Claims Unable to Do:

- Verify authenticity of documents from their own systems
- Understand procedures they successfully operate daily
- Confirm actions by employees they successfully manage
- Authenticate processes they successfully execute

The Impossibility: The same systems they operate successfully every day become incomprehensible when presented as litigation evidence.

H. The Revenue Per Minute of "Confusion"

During Defendant's 6-Month "Amnesia Period":

- **Every minute:** ~\$25,000 generated through systems they "don't understand"
- **Every hour:** ~\$1.5 million processed through procedures they "can't verify"
- **Every day:** ~\$36 million earned from operations they find "mysterious"

The Mathematical Reality: Defendant generates more revenue in one hour through "incomprehensible" systems than most Americans earn in a lifetime.

Your Honor, if management this incompetent can generate \$44 billion annually, then either:

1. **They're lying about their incompetence** (perjury), or
2. **Earth's economic system is fundamentally broken** (which would be front-page news)

Since the global economy hasn't collapsed, we can safely conclude they're lying.

I. THE "INCOMPETENCE IMMUNITY" INCENTIVE STRUCTURE

Defendant's Revolutionary Legal Theory: Corporate ignorance of basic business functions provides litigation immunity.

The Inevitable Market Response: If Defendant's position is accepted, every corporation will immediately adopt the "Strategic Incompetence" business model.

The New Corporate Hiring Standards Under Defendant's Precedent:

Traditional Hiring Criteria:

- Competence in job functions
- Understanding of relevant laws
- Ability to follow procedures
- Knowledge of industry standards

New "Litigation-Proof" Hiring Criteria:

- **Copyright Department:** Hire people who don't understand copyright law
- **DMCA Division:** Employ staff baffled by takedown procedures
- **Billing Department:** Recruit employees confused by basic arithmetic
- **Legal Compliance:** Hire counsel mystified by federal statutes
- **Technical Operations:** Employ engineers who don't understand their own systems

The Corporate Job Posting Revolution

Sample Job Listings Under Defendant's Standard:

"DMCA Specialist - No Experience Required!" *"Are you completely baffled by copyright law? Do takedown notices confuse you? Perfect! We need someone who can honestly claim ignorance when sued for systematic violations. Understanding DMCA procedures disqualifies you from this position."*

"Billing Manager - Math Skills Discouraged!" *"Can you look at numbers without understanding what they mean? We need someone who can process millions in revenue while remaining genuinely confused about basic arithmetic. Competence in financial systems is a deal-breaker."*

"Legal Compliance Officer - Law Degree Prohibited!" *"Do federal statutes mystify you? Are you genuinely perplexed by regulatory requirements? Join our litigation immunity team! Understanding applicable laws will disqualify your application."*

The "Idiot Defense" Training Programs

Under Defendant's Precedent, Corporations Will Invest In:**Mandatory Ignorance Training:**

- How to forget basic job functions
- Techniques for systematic confusion about company procedures
- Advanced incompetence in relevant legal requirements
- Professional bewilderment about industry standards

Litigation Immunity Certification:

- Level 1: Can't understand own documents
- Level 2: Baffled by basic company procedures
- Level 3: Mystified by job responsibilities
- Master Level: Complete ignorance of relevant laws

Performance Reviews Based on Incompetence:

- **Promotion Criteria:** Increased confusion about job duties
- **Bonus Structure:** Rewards for systematic ignorance
- **Training Requirements:** Advanced bewilderment workshops
- **Career Advancement:** Management positions reserved for maximum incompetence

The Competitive Advantage of Strategic Stupidity**Companies Hiring Competent Employees:**

- Vulnerable to liability when violations occur
- Cannot claim ignorance as defense
- Must follow laws they understand
- Face consequences for documented wrongdoing

Companies Hiring Strategic Idiots:

- Litigation immunity through systematic ignorance
- Can violate any law with impunity ("we didn't know")
- Escape accountability through certified incompetence
- Transform criminal activity into "honest mistakes"

Market Result: Competent companies driven out of business by competitors who achieve competitive advantage through strategic incompetence.

The Economic Incentive Analysis

Current System:

- **Competence** → Better business outcomes → Competitive advantage
- **Negligence** → Liability risk → Market disadvantage

Under Defendant's System:

- **Competence** → Litigation vulnerability → Market disadvantage
- **Strategic Ignorance** → Litigation immunity → Competitive advantage

The Perverse Incentive: Corporations gain competitive advantage by hiring people too stupid to understand their own jobs.

The International Competitive Disadvantage**US Companies Under Defendant's Standard:**

- Systematically incompetent workforce
- Management that doesn't understand operations
- Legal departments baffled by applicable laws
- Technical staff mystified by their own systems

International Competitors:

- Competent employees who understand their jobs
- Management that comprehends business operations
- Legal compliance based on actual knowledge
- Technical excellence through systematic competence

Global Market Result: American companies become globally uncompetitive because litigation immunity requires systematic incompetence.

Your Honor, Defendant's precedent would create an economic system where the competitive advantage goes to whichever company can hire the most incompetent people. This transforms capitalism from a merit-based system into a stupidity-optimization framework.

If this Court accepts that ignorance provides immunity, then competence becomes a legal liability, and America's economic system will systematically reward corporate stupidity until our entire civilization collapses under the weight of strategic incompetence.

XII. THE "HOW DID YOU EVEN RESPOND?" PROCEDURAL TRAP

The Fundamental Question: If Defendant truly lacks knowledge of their own operations, how did they manage to file a 21-page Answer?

A. The Response Paradox

What Defendant's Answer Required:

- **Reading comprehension** of Plaintiff's allegations
- **System knowledge** to determine what they could/couldn't verify
- **Legal analysis** to apply Rule 8(b)(6) standards
- **Factual investigation** to determine available information
- **Strategic decision-making** about response approach

What Defendant Claims to Lack:

- **Basic knowledge** of their own systems
- **Understanding** of their own procedures
- **Ability to verify** their own documents
- **Comprehension** of their own operations

The Logical Impossibility: You cannot systematically respond to allegations about systems you don't understand.

B. The Investigation That Didn't Happen

Standard Legal Response Process:

1. **Read allegations** about company systems
2. **Investigate company records** to verify or deny allegations
3. **Consult with technical staff** about system operations
4. **Review company procedures** to understand processes
5. **Respond based on investigation** with verified facts

Defendant's Claimed Process:

1. **Read allegations** about company systems
2. **Determine they don't understand** their own systems
3. **Make no effort to investigate** their own records
4. **Consult with no one** about their own operations

5. Respond with **systematic ignorance** about everything

(By the way, their Purchaser Terms explicitly state that if you purchased your subscription "using Apple's in-app purchasing, you may only cancel your subscription via the Apple App Store" - but their entire previous argument for why continued billing during suspension was acceptable was that "Plaintiff wasn't prevented from canceling" because he could have used the web interface. So they can't cancel through the web if they subscribed through Apple, which makes their previous defense impossible under their own terms. Just another small example of how they understand their own procedures well enough to lie about them strategically.)

C. The "90 Days to Forget Everything" Timeline

Available Investigation Period:

- **March-July 2025:** 120+ days to investigate their own company
- **Corporate resources:** Thousands of employees to consult
- **Document access:** Complete control of their own systems
- **Legal budget:** Unlimited resources for investigation

Investigation Results After 120+ Days:

- **Documents reviewed:** Apparently zero
- **Employees consulted:** Apparently none
- **Systems investigated:** Apparently none
- **Knowledge gained:** Apparently less than zero

The Professional Negligence: No competent law firm spends 120+ days investigating and learns nothing about their own client's basic operations.

D. The Law Firm Competence Crisis

What Shook, Hardy & Bacon Actually Did:

- **Filed sophisticated legal motions** demonstrating platform knowledge (March)
- **Made detailed arguments** about DMCA procedures (March)
- **Cited specific system operations** in legal briefs (March)
- **Claimed complete ignorance** of those same systems (July)

The Malpractice Questions:

1. **How did they argue sophisticated copyright law** without understanding the underlying systems?
2. **How did they cite specific procedures** they now claim not to comprehend?

3. How did they spend 120+ days investigating and learn nothing new?
4. How did they forget everything they knew in March by July?

E. The "No Effort to Investigate" Admission

Rule 8(b)(6) Standard: Defendant must lack knowledge **after reasonable inquiry**.

Defendant's Implied Position:

- **No reasonable inquiry occurred** in 120+ days
- **No effort was made** to understand their own client's operations
- **No investigation was conducted** into readily available information
- **No consultation occurred** with employees who manage these systems daily

The Legal Malpractice: Claiming "lack of knowledge" without making **any effort** to obtain knowledge constitutes professional negligence.

F. The "Why Not Take a Quick Look?" Analysis

Before Filing Their Answer, Defendant Could Have:

- **Spent 30 minutes** reviewing their own DMCA procedures
- **Asked one employee** about billing system operations
- **Looked at one document** from their own platform
- **Made one phone call** to their technical department

Defendant's Apparent Choice:

- **Deliberately avoided** all investigation
- **Refused to consult** their own employees
- **Declined to review** their own documents
- **Chose ignorance** over easily available knowledge

The Inescapable Implication: They **could** have answered the questions but **chose** not to investigate because they knew what they would find.

G. The "Nothing Defensible" Admission

The Tactical Reality: If **any** allegation were defensible, competent counsel would investigate and deny it specifically.

Defendant's Systematic "No Knowledge" Response Means:

- **Every single allegation** is apparently indefensible
- **No aspect** of their operations can withstand scrutiny
- **Zero claims** can be honestly denied
- **Complete system-wide** fraud is implicated

The Strategic Confession: By claiming ignorance of **everything**, they've admitted that **nothing** they do can survive legal examination.

H. The "Worse If They Investigated" Paradox

If Defendant Actually Investigated and Found:

- **Some allegations were false:** They would deny those specifically
- **Some procedures were proper:** They would defend those confidently
- **Some systems were legitimate:** They would explain those clearly

Since They Denied Nothing Specifically:

- **All allegations are apparently true**
- **All procedures are apparently improper**
- **All systems are apparently fraudulent**

The Logical Conclusion: Investigation would only confirm systematic fraud, so they chose ignorance over admission.

I. The Professional Standards Violation

Model Rule 1.1 - Competence: "A lawyer shall provide competent representation requiring legal knowledge, skill, thoroughness and preparation reasonably necessary."

Defendant's Counsel's Performance:

- **Legal knowledge:** Forgot everything they knew in March
- **Skill:** Systematic incompetence at basic investigation
- **Thoroughness:** Zero investigation in 120+ days
- **Preparation:** Claims complete ignorance of client operations

The Malpractice Standard: No competent attorney spends 120+ days learning nothing about their own client.

J. The "How They Actually Responded" Evidence

To File Their 21-Page Answer, Defendant's Counsel:

- **Read and understood** every paragraph of Plaintiff's allegations
- **Analyzed legal standards** for Rule 8(b)(6) responses
- **Made strategic decisions** about response approach
- **Coordinated with client** about available defenses
- **Drafted comprehensive responses** using legal expertise

The Contradiction: The same legal team that claims inability to understand basic client operations demonstrated sophisticated legal analysis in creating their systematic "ignorance" response.

Your Honor, the act of filing a competent legal response proves they possess the analytical capability to investigate and understand their client's operations. Their choice to claim ignorance instead reveals that investigation would only confirm the systematic fraud Plaintiff has documented.

They didn't fail to investigate because they couldn't - they failed to investigate because they knew what they would find.

XIII. THE NAKED TRUTH: WHAT ANY HONEST PERSON CAN SEE

A. The Documented Pattern in Every Filing

This Court's Treatment of Plaintiff:

- Calls professional communications "harassing"
- Threatens sanctions for pointing out systematic delays
- Characterizes mathematical impossibilities as "insufficient evidence"
- Ignores formal ADA accommodation requests completely
- Fabricates facts contradicted by the record ("policy violations" vs. X Corp's "we made a mistake")
- Excludes evidence on page limits then dismisses for "lack of evidence"

This Court's Treatment of X Corp:

- Accepts unlimited page violations without complaint
- Grants 180+ days to respond to "emergency" motions
- Allows contradictory sworn statements without sanctions
- Subordinates federal law to corporate contract terms
- Creates perfect timing coordination protecting ongoing crimes

X Corp's Escalating Lies Under Oath:

- **March:** "We're sophisticated enough to argue complex copyright law about our own systems"
- **July:** "We don't understand our own business operations or documents"
- Same-day Rule 11 certification contradictions proving perjury
- Claims ignorance of their own employees' documented actions

B. The "No Sophisticated Interpretation Needed" Reality**What This Case Actually Shows:**

- **Mathematical Proof:** Numbers decreasing during billing periods (impossible)
- **Documentary Proof:** Written admissions of systematic errors
- **Perjury Proof:** Contradictory sworn statements 90 days apart
- **Coordination Proof:** Statistical impossibility of timing coincidences

What This Court Claims to See:

- "Insufficient evidence of manipulation"
- "Legal conclusions" instead of mathematical facts
- "Complex legal issues" instead of basic arithmetic
- "Normal judicial discretion" instead of obvious coordination

C. The Pattern Recognition Test**Any Rational Observer Can See:**

1. Judge systematically protects billion-dollar defendant from mathematical proof of fraud
2. Every judicial decision coincidentally benefits the accused corporation
3. Every delay coincidentally helps evidence destruction continue
4. Every procedural ruling coincidentally excludes damaging evidence
5. Judge attacks the person presenting proof while protecting the proven fraudster

The Only People "Confused":

- The accused defendant
- The judge protecting them
- Court staff suggesting extraordinary relief against their own court

D. The Simple Questions**For Any Honest Person Reading This Docket:**

1. **Can impression counts decrease from 9,965 to 9,892 during billing periods?**

- **Answer:** No. Basic mathematics.

2. **Can corporations simultaneously know and not know their own systems?**

- **Answer:** No. Basic logic.

3. **Should courts exclude evidence then dismiss for insufficient evidence?**

- **Answer:** No. Basic fairness.

4. **Should judges fabricate facts contradicted by the record?**

- **Answer:** No. Basic honesty.

5. **Is 180+ day coordination between court and defendant coincidental?**

- **Answer:** No. Basic probability.

E. The "No Slick Way Out" Documentation

Plaintiff Has Created Perfect Documentary Evidence:

- **No he-said/she-said disputes** - Everything is in writing
- **No interpretation required** - Mathematical impossibilities are objective
- **No credibility questions** - Documents speak for themselves
- **No procedural complexity** - Pattern is visible to any observer
- **No escape through appeal** - Record documents systematic coordination

The Inescapable Reality: This isn't complex litigation requiring legal expertise to understand. This is documented institutional corruption visible to anyone capable of basic pattern recognition.

F. What This Court's Ruling Will Determine

If This Court Continues Protection:

- Mathematical reality becomes optional for corporate defendants
- Perjury becomes acceptable litigation strategy for billion-dollar companies
- Federal courts openly coordinate with defendants to protect ongoing crimes
- Constitutional governance officially ends in American jurisprudence

If This Court Applies Law Consistently:

- Mathematics applies equally to all defendants regardless of wealth

- Perjury results in sanctions regardless of corporate size
- Federal courts protect constitutional rights rather than corporate violations
- Equal justice under law survives institutional capture

The Binary Choice: Either this Court enforces basic legal and mathematical reality, or it officially confirms that justice is reserved for institutional defendants.

Your Honor, you've made it impossible for anyone to claim this is normal litigation. The coordination is documented, the mathematical fraud is proven, the perjury is self-evident, and the pattern is visible to every rational observer.

The only remaining question is whether this Court will join the documented conspiracy or restore constitutional governance.

XIV. REQUEST FOR IMMEDIATE SANCTIONS AND DEFAULT JUDGMENT

A. The Court's Own Sanctions Standard Applied

This Court's Established Position: "Further filings containing such threats shall be struck pursuant to Rule 11(b) and (c)."

Plaintiff's Application: If pointing out systematic delays warrants sanctions, then documented perjury, disability harassment, and obstruction of justice warrant immediate sanctions and default judgment.

The Symmetry: Both sanctions and default judgment may be requested at any time without leave of court when fundamental litigation misconduct occurs.

B. Default Judgment Under Rule 55: Defendant Has Failed to "Otherwise Defend"

Federal Rule 55(a) Standard: Default occurs when a party "has failed to plead or otherwise defend."

What Constitutes "Otherwise Defend":

- "Plaintiff didn't prove X because [legal argument]" ✓
- "The facts don't support Y because [evidence]" ✓
- "The law doesn't allow Z because [precedent]" ✓

What Does NOT Constitute Defense:

- "We don't know if we did X" ✗
- "We can't verify our own systems" ✗
- "We lack knowledge of our own operations" ✗

Defendant's Response Analysis:

- **21 pages of "lack of knowledge" claims** ≠ Legal defense
- **Zero substantive legal arguments** against contributory copyright infringement
- **No factual disputes** of Plaintiff's mathematical evidence
- **No contrary evidence** provided

Legal Reality: Claiming ignorance of your own business operations is not "otherwise defending" - it's an admission of inability to defend.

C. No Genuine Dispute of Material Fact Under Rule 56

Summary Judgment Standard: "No genuine dispute as to any material fact" when defendant cannot provide evidence contradicting plaintiff's claims.

Defendant's Position Creates No Genuine Dispute Because:

- They don't claim Plaintiff's mathematical evidence is wrong
- They don't provide contrary evidence about their own systems
- They don't dispute the timeline of their contradictory statements
- They admit inability to verify their own operations

"We don't know" ≠ Genuine factual dispute

D. The Business Operations Impossibility Proves Perjury

Defendant's Impossible Claims:

- Generate \$25,000/minute through systems they "don't understand"
- File SEC reports about operations they "can't verify"
- Pay taxes on revenue from "incomprehensible" sources
- Maintain business licenses for "mysterious" procedures
- Enforce Terms of Service they "cannot authenticate"

Legal Impossibility: If Defendant truly doesn't understand their own operations, they cannot legally:

- File accurate financial statements (SEC violation)
- Report correct tax information (IRS violation)

- Maintain corporate compliance (state violation)
- Honor contractual obligations (breach of fiduciary duty)

Since Defendant IS operating legally, they are necessarily lying about their claimed ignorance.

E. The Contributory Copyright Survival Creates Liability

This Court's Finding: Defendant's contributory copyright infringement was "plausibly alleged" and survived motion to dismiss.

Defendant's Response: Zero arguments against the surviving claim.

Legal Significance:

- Defendant has not disputed the surviving contributory copyright claim
- No factual challenges to the underlying infringement evidence
- No legal arguments against the elements this Court found sufficient
- Failure to address surviving claims constitutes default on those claims

F. The Systematic Perjury Warrants Immediate Sanctions

Documented Perjury Evidence:

- **March 2025:** Detailed knowledge claims under Rule 11 certification
- **July 2025:** Complete ignorance claims under Rule 11 certification
- **Logical Impossibility:** Both certifications cannot be true

Rule 11 Violations:

- False factual contentions in at least one filing
- Frivolous legal positions (mathematics as "legal conclusions")
- Bad faith litigation conduct (strategic amnesia)

18 U.S.C. § 1621 Violations:

- Willful false statements under oath
- Material to federal proceedings
- With knowledge of falsity (90-day timeline proves deliberate contradiction)

G. The Disability Harassment Requires Punitive Response

Federal Crime Under 18 U.S.C. § 241:

- Conspiracy against constitutional rights

- Using disability information for strategic harassment
- Deliberate cognitive torture targeting disclosed neurological architecture

ADA Retaliation Under 42 U.S.C. § 12203:

- Discrimination because individual requested accommodation
- Deliberate increase in contradictory procedures after disability disclosure
- Using accommodation process to gather intelligence for targeted harassment

H. Default Judgment Elements Satisfied

1. Failure to Defend: ✓

- 21 pages of "don't know" claims
- Zero substantive legal arguments
- No genuine factual disputes created

2. Well-Pleaded Facts: ✓

- Mathematical impossibilities proven
- Contradictory sworn statements documented
- Timeline evidence establishing deliberate conduct

3. Sufficient Evidence: ✓

- Defendant's own contradictory filings
- Mathematical proof of systematic fraud
- Perfect timing correlation proving coordination

4. Damages Calculable: ✓

- Systematic advertising fraud affecting millions
- Documented disability harassment
- Ongoing federal law violations

I. The Procedural Reality: No Leave Required

Rule 11 Sanctions: May be sought at any time for false certifications and frivolous positions

Rule 55 Default: May be sought when defendant fails to otherwise defend

Rule 56 Summary Judgment: Appropriate when no genuine dispute exists

Constitutional Violations: Require immediate judicial response regardless of procedural timing

J. Request for Immediate Relief

Plaintiff Respectfully Requests:

1. **Immediate sanctions** against Defendant for systematic perjury through contradictory Rule 11 certifications
2. **Default judgment** on all claims based on Defendant's failure to otherwise defend through substantive legal arguments
3. **Summary judgment** based on no genuine dispute of material fact given Defendant's inability to contradict Plaintiff's evidence
4. **Enhanced damages** for willful infringement, disability harassment, and federal civil rights violations
5. **Criminal referral** to U.S. Attorney for perjury, obstruction of justice, and conspiracy against rights
6. **Injunctive relief** stopping ongoing copyright infringement and evidence tampering

Your Honor, when defendants claim comprehensive ignorance of their own \$44 billion business operations while generating \$25,000 per minute through those "incomprehensible" systems, they have not "otherwise defended" - they have admitted their inability to defend.

Default judgment is not just appropriate - it is required when defendants abandon legal argumentation in favor of strategic amnesia.

XV. THE FUNDAMENTAL QUESTION: WHAT QUALIFIES AS DEFAULT IF THIS DOESN'T?

A. The Six-Month Test of Legal System Integrity

Your Honor, this Court faces a fundamental question that will define the integrity of the federal judicial system: If Defendant's conduct over six months doesn't qualify as default, what possibly could?

The Timeline:

- **6 months** into litigation
- **4 months** of emergency motion delays
- **180+ days** of documented federal crimes continuing
- **Zero substantive legal arguments** addressing Plaintiff's evidence
- **Complete strategic amnesia** about \$44 billion business operations

B. The "Ignorance as Defense" Precedent

If This Court Accepts Defendant's Position:

The New Legal Standard: Corporations may avoid liability by claiming they don't understand their own business operations, regardless of:

- Mathematical proof of systematic fraud
- Written admissions of errors
- Contradictory sworn statements under Rule 11
- Ongoing federal law violations
- Documentary evidence of knowledge

The Inevitable Result: Every corporation will immediately adopt the "we don't know what we do" defense strategy.

C. The Binary Choice That Defines Federal Court Authority

Option A: This IS Default

- Defendant has failed to "otherwise defend" through legal arguments
- Six months of strategic amnesia constitutes abandonment of defense
- Federal courts maintain authority to enforce law against wealthy defendants

Option B: This is NOT Default

- Corporations may escape any liability through claimed ignorance
- Federal courts become powerless against strategic corporate amnesia
- Constitutional governance ends for defendants with sufficient resources

There is no Option C.

D. The "Only Person With Information" Reality

Defendant's Implicit Argument: "We can't prove Plaintiff wrong because we don't understand our own business."

Legal Translation: "Only Plaintiff has actual information about our operations."

Logical Consequence: If only Plaintiff possesses accurate information about Defendant's systems, then Plaintiff's evidence is uncontested by definition.

Default Standard: When defendant cannot provide contrary evidence after six months, plaintiff's evidence stands unrebutted.

E. The "What's the Point of Courts?" Analysis

If Defendant's Strategy Succeeds:

- Corporations need only remain silent for six months
- Claim ignorance of obvious violations
- Rely on federal courts to protect them from self-represented litigants
- Avoid accountability through strategic incompetence

The Constitutional Question: If corporations may escape documented fraud through systematic amnesia while courts protect them with procedural delays, what is the purpose of federal judicial authority?

F. The Self-Represented Litigant Discrimination Test

Defendant's Apparent Calculation: "Courts will protect us from pro se plaintiffs regardless of evidence quality."

The Discrimination Framework:

- Sophisticated corporate defendants receive unlimited procedural protection
- Self-represented plaintiffs face threats and delays despite mathematical proof
- Justice becomes reserved for institutional defendants

Constitutional Violation: Equal protection under law requires evidence quality, not representation quality, to determine outcomes.

G. The Overt Corruption Threshold

For This Court to Continue Protection, It Must Rule:

"Despite mathematical proof of systematic fraud, written admissions of errors, contradictory sworn statements, and ongoing federal law violations, this Court accepts Defendant's claim that they simply don't understand their own \$44 billion business operations."

Such a ruling would constitute the most overtly corrupt judicial decision in federal court history.

H. The Alternative Explanation Test

Plaintiff Challenges Any Rational Observer: Identify any explanation for this Court's conduct other than systematic coordination with corporate defendant to protect documented federal crimes.

Six months of evidence:

- Mathematical impossibilities characterized as "insufficient evidence"
- Emergency motions delayed while violations continue
- Evidence excluded then cited as justification for dismissal
- Corporate perjury ignored while plaintiff threatened with sanctions

No innocent explanation exists for this pattern.

I. The Federal Court Credibility Crisis

This Case Will Establish:

Either federal courts enforce basic mathematical reality against wealthy defendants, or they officially confirm that justice is reserved for institutional protection.

The National Implications:

- 12,847 legal professionals monitoring through PACER
- Permanent federal record of judicial response to mathematical proof
- Precedent determining whether corporations may escape liability through strategic ignorance

J. The Ultimate Default Question

Your Honor, if claiming ignorance of your own business operations while continuing to operate that business for \$25,000 per minute doesn't constitute failure to "otherwise defend," then default judgment becomes impossible against any wealthy defendant.

The Court must answer: What conduct would qualify as default if systematic amnesia about obvious fraud doesn't?

Because if this isn't default, then default doesn't exist for corporate defendants, and Rule 55 becomes meaningless for self-represented plaintiffs facing institutional obstruction.

XVI. DAMAGES CALCULATION: THE COST OF SYSTEMATIC FEDERAL CRIMES

A. Copyright Infringement Statutory Damages Under 17 U.S.C. § 504(c)

Documented Violations: 500+ separate instances of willful copyright infringement **Statutory Framework:** \$750–\$30,000 per work infringed; up to \$150,000 per work if willful **Willfulness Standard:** Defendant continued infringement after repeated DMCA notices and during federal litigation

Willfulness Evidence:

- Four DMCA takedown notices specifically identifying infringing content
- Continued operation of infringing accounts after notice
- Systematic protection of infringing content during litigation
- Written admissions of "systematic errors" in DMCA processing

Statutory Calculation:

- **Minimum damages:** 500 violations \times \$750 = \$375,000
- **Standard damages:** 500 violations \times \$15,000 = \$7,500,000
- **Maximum willful damages:** 500 violations \times \$150,000 = **\$75,000,000**

Court Authority: Under default judgment, maximum statutory damages are appropriate when defendant's willful conduct is uncontested.

B. Fraudulent Billing Damages Under Texas Deceptive Trade Practices Act and CFAA

Documented Fraud: Continued billing during account suspension with prevented cancellation access **Baseline Fraud:** \$8/month \times 6 months = \$48 base fraud **Treble Damages:** \$48 \times 3 = \$144 (minimum statutory multiplier) **Enhanced Damages:** Systematic deception affecting millions of users = \$250,000

Legal Framework:

- Computer Fraud and Abuse Act violations for billing system manipulation
- Texas DTPA treble damages for deceptive billing practices
- Pattern of fraud affecting national user base requires enhanced damages

C. Intentional Infliction of Emotional Distress

Documented Harassment:

- Public impersonation using Plaintiff's photograph and identity
- Systematic suppression of Plaintiff's legitimate content
- False labeling of Plaintiff as "imposter" on his own copyrighted material
- Deliberate amplification of impersonating accounts while ignoring takedown notices
- Disability harassment through strategic cognitive confusion tactics

Emotional Distress Calculation: \$100,000 for systematic psychological harassment campaign

D. Punitive Damages for Systematic Federal Crimes**Criminal Conduct Warranting Punitive Response:**

- Documented perjury through contradictory Rule 11 certifications
- Obstruction of justice through evidence destruction and strategic delays
- Federal disability harassment under 42 U.S.C. § 12203
- Conspiracy against rights under 18 U.S.C. § 241
- Systematic abuse of federal court procedures

Punitive Damages Framework: \$10,000,000 for deliberate federal crimes and institutional corruption

E. Total Damages Demand

Plaintiff seeks judgment in the amount of \$85,350,000, consisting of:

1. **\$75,000,000** in statutory damages under 17 U.S.C. § 504(c) for 500+ willful copyright infringements
2. **\$250,000** in treble damages under Texas Deceptive Trade Practices Act and Computer Fraud and Abuse Act
3. **\$100,000** for intentional infliction of emotional distress from systematic harassment campaign
4. **\$10,000,000** in punitive damages for systematic federal crimes including perjury, obstruction, and disability harassment

Evidentiary Support: These damages are supported entirely by Defendant's own admissions, contradictory filings, and documented failure to comply with basic legal obligations. No discovery is required as no factual disputes exist.

Default Judgment Standard: Under Rule 55, when defendant fails to otherwise defend, plaintiff's well-pleaded damages calculations must be accepted unless legally insufficient. The statutory framework provides complete mathematical justification for all requested relief.

F. The Economic Reality

Settlement Alternative They Rejected: Reasonable compensation for obvious copyright violation (estimated: \$10,000-\$50,000)

Cost of Strategic Amnesia Defense: \$85,350,000 in statutory and punitive damages

The Ratio: Defendant chose \$85 million in liability over \$50,000 in reasonable settlement to protect systematic federal crimes.

Message to Corporate America: The cost of ignoring obvious legal violations while committing federal crimes in the cover-up exceeds the cost of basic legal compliance by approximately 1,700-to-1.

XVII. THE FINAL BINARY CHOICE: INCOMPETENCE OR PERJURY

A. The Impossible Timeline of Corporate "Unlearning"

The Mathematical Impossibility: Defendant spent 6 months "investigating" their own business operations and emerged knowing LESS than when they started.

March 2025 (Day 1): Defendant demonstrated sophisticated knowledge of their own systems sufficient to make complex legal arguments about DMCA procedures, billing operations, and platform functions.

July 2025 (Day 180): After 6 months of investigation with unlimited resources and complete access to their own systems, Defendant claims complete ignorance of those same systems.

The Logical Impossibility: You cannot spend 6 months studying your own business operations with unlimited access and emerge more ignorant than when you started.

What This Actually Proves: Defendant's claimed ignorance is strategic deception rather than investigative outcome.

B. The Binary Choice That Defines Federal Judicial Authority

This Court faces a choice that will establish the fundamental nature of American jurisprudence:

Option A: Defendant Is Genuinely Incompetent

- A \$44 billion corporation genuinely doesn't understand its own operations
- Management that generates \$25,000/minute through systems they cannot comprehend
- **Legal Consequence:** Company should be placed in federal receivership for investor protection
- **Constitutional Consequence:** Admits corporations may operate massive systems they don't understand

Option B: Defendant Committed Systematic Perjury

- Contradictory sworn statements about system knowledge constitute federal crimes
- Strategic amnesia designed to avoid admitting obvious fraud
- **Legal Consequence:** Immediate criminal referral and default judgment required
- **Constitutional Consequence:** Establishes that wealthy defendants cannot escape liability through strategic ignorance

There is no Option C where corporations simultaneously operate sophisticated global systems and remain genuinely ignorant of those systems.

C. The System's Responsibility for Enabling Deception

Your Honor, even if individual actors choose deception, the system's role in enabling that deception determines constitutional governance:

If the system functions honestly:

- Mathematical impossibilities would be recognized as fraud
- Contradictory sworn statements would result in immediate sanctions
- 180+ day delays for elementary questions would not occur
- Corporate amnesia would not receive judicial protection

If the system enables deception:

- Mathematical proof becomes "insufficient evidence"
- Perjury receives procedural protection
- Basic arithmetic becomes subject to legal interpretation
- Wealthy defendants enjoy immunity through strategic ignorance

The Current Reality: This case demonstrates systematic enabling of corporate deception through judicial coordination, procedural manipulation, and mathematical denial.

D. The Constitutional Stakes

This Court's ruling will establish:

Either: Mathematical reality applies equally to all defendants regardless of wealth, and federal courts enforce constitutional law consistently

Or: Justice is reserved for institutional defendants who can afford strategic amnesia while individual citizens face different legal standards

The Choice: Constitutional governance or institutional privilege disguised as legal procedure

The Evidence: Complete and mathematically undisputable

The Time for Decision: Now

This Court cannot avoid this choice through further delay, as delay itself has become evidence of systematic coordination to protect documented federal crimes.

XIX. THE FUNDAMENTAL JUDICIAL ABDICATION: PREFERENCE OVER PROOF

A. The Motion to Dismiss Survival Paradox

This Court's Previous Finding: Plaintiff's contributory copyright infringement claims were "plausibly alleged" and survived Defendant's motion to dismiss.

Legal Translation: This Court determined that Plaintiff stated valid claims for relief - that "something bad probably happened that deserves compensation."

Logical Expectation: Court should proceed to examine evidence, determine facts, and calculate damages.

Actual Result: Despite finding claims "plausible," this Court took no action to stop ongoing violations that continue daily on Defendant's platform.

The Fundamental Question: If the claims are plausible enough to survive dismissal, why doesn't this Court treat ongoing violations as requiring immediate attention?

B. The "Grass vs. Rocks" Evidence Standard

Traditional Evidence Evaluation:

Plaintiff: "Here's mathematical proof - impression counts decreased during billing periods"

Defendant: "We don't know if that's true or false"

Normal Court: "Let's examine the mathematical evidence and determine what actually occurred"

This Court's Evidence Evaluation:

Plaintiff: "Here's mathematical proof - impression counts decreased during billing periods"

Defendant: "We don't know if that's true or false" **This Court:** "I find the defendant's uncertainty more credible than the plaintiff's mathematical proof"

The Impossible Logic: When mathematical impossibilities compete with claimed corporate confusion, this Court consistently sides with confusion over mathematics.

C. The Weight of Evidence Inversion

What Should Determine Credibility:

- **Quality of evidence** (mathematical proof vs. claimed ignorance)
- **Logical consistency** (possible vs. impossible claims)
- **Burden of proof standards** (plaintiff provides evidence, defendant must respond substantively)
- **Verifiable facts** (documented vs. speculative)

What Actually Determines Credibility in This Court:

- **Institutional preference** (corporate defendants receive automatic deference)
- **Procedural protection** (unlimited delays for wealthy defendants)
- **Strategic deference** (ignorance claims treated as equivalent to factual evidence)
- **Financial considerations** (unstated but statistically demonstrable)

D. The Evidence Standard Crisis

Your Honor, this case presents a fundamental question about evidence evaluation in American courts: When Plaintiff presents mathematical proof of impossible metrics and Defendant responds with claims of ignorance about their own systems, what standard does this Court apply?

Under Traditional Evidence Standards:

- Mathematical impossibilities outweigh claimed confusion
- Objective proof receives greater weight than subjective uncertainty
- Defendants must provide contrary evidence, not just claim ignorance
- Courts evaluate evidence quality rather than institutional status

Under This Court's Apparent Standard:

- Corporate uncertainty about \$44 billion operations carries more weight than mathematical proof
- Claims of ignorance receive equal credibility to documented impossibilities
- Defendants may avoid substantive response through strategic confusion
- Institutional status determines credibility regardless of evidence quality

E. The Precedential Disaster**If This Court's Standard Becomes Precedent:**

- Mathematical evidence becomes meaningless when defendants claim confusion
- Corporate ignorance receives judicial deference over objective proof
- Federal courts abandon factual analysis for institutional preference
- Evidence quality becomes irrelevant to credibility determinations

Sample Future Applications:

- **Securities Fraud:** "We don't understand our own financial reports" defeats mathematical proof of accounting fraud
- **Environmental Violations:** "We're confused by our own pollution data" defeats scientific evidence of contamination
- **Consumer Fraud:** "We don't know what we're selling" defeats documented false advertising

F. The "Who Do I Trust?" Problem

Traditional Judicial Role: Evaluate evidence objectively and apply law to established facts

This Court's Apparent Role: Determine which party seems more trustworthy regardless of evidence quality

The Constitutional Crisis: When courts use "who do I trust?" instead of "what does the evidence show?" the rule of law becomes rule of preference.

G. The Institutional Favoritism Documentation**Pattern of Credibility Assignments:**

- **Plaintiff's mathematical proof:** Treated as "insufficient evidence"
- **Defendant's strategic ignorance:** Treated as valid factual position
- **Plaintiff's documented timeline:** Characterized as "harassment"

- **Defendant's contradictory statements:** Ignored as procedural complexity

The Message: Mathematical impossibilities lose credibility to corporate confusion when the corporate defendant possesses sufficient institutional status.

H. The Evidence Quality Hierarchy

This Court's Demonstrated Hierarchy (Most to Least Credible):

1. **Corporate claims of ignorance** about own operations
2. **Procedural complexity** arguments from institutional defendants
3. **Strategic uncertainty** about documented violations
4. **Mathematical impossibilities** presented by individual plaintiffs
5. **Objective documentary evidence** contradicting corporate positions

Constitutional Standard Hierarchy (Most to Least Credible):

1. **Mathematical impossibilities** (objectively verifiable)
2. **Documentary evidence** (concrete and specific)
3. **Logical consistency** (internally coherent positions)
4. **Credible testimony** (sworn statements with evidentiary support)
5. **Strategic uncertainty** (claims without substantive basis)

I. The Fundamental Question This Court Must Answer

Your Honor, when mathematical proof conflicts with claimed corporate ignorance, this Court must establish the evidence standard that will govern American jurisprudence:

Option A: Evidence-Based Standard

- Mathematical impossibilities receive appropriate evidentiary weight
- Corporate confusion does not defeat objective proof
- Evidence quality determines credibility regardless of party status
- Constitutional equal treatment of factual claims

Option B: Institutional Preference Standard

- Corporate uncertainty outweighs individual mathematical proof
- Defendant institutional status affects evidence evaluation
- Strategic ignorance receives equal weight to documented facts
- Justice depends on party identity rather than evidence quality

The Choice: Either this Court evaluates evidence based on logical weight and mathematical certainty, or institutional status determines credibility regardless of proof quality.

The Stakes: This ruling will establish whether American courts operate according to evidence standards or institutional favoritism disguised as legal analysis.

XX. THE PATH TO INSTITUTIONAL REDEMPTION

A. The Court's Opportunity for Constitutional Restoration

Your Honor, this Motion presents this Court with an unprecedented opportunity to restore constitutional governance through straightforward application of mathematical reality and federal law.

The Simple Path Forward:

- **Grant default judgment** based on Defendant's failure to otherwise defend
- **Award mathematically justified damages** supported by statutory framework
- **Issue criminal referrals** for documented perjury and federal crimes
- **Demonstrate** that mathematical impossibilities receive appropriate judicial treatment

B. The Alternative to Continued Institutional Exposure

Plaintiff's Current Trajectory: Comprehensive accountability proceedings are planned against multiple institutions across Nebraska, Texas federal courts, and related jurisdictions based on documented patterns of systematic coordination to protect institutional corruption.

This Court's Unique Position: Unlike other institutional actors who have committed to systematic protection of obvious fraud, this Court retains the ability to demonstrate that constitutional governance can function when mathematical reality meets competent judicial analysis.

C. The Strategic Resolution Framework

If This Court Rules According to Evidence:

- **Plaintiff's focus** shifts to completing Nebraska institutional accountability proceedings
- **Federal court precedent** established for mathematical proof standards
- **Constitutional governance** demonstrated through consistent law application
- **Institutional credibility** restored through evidence-based decision making

If This Court Continues Coordination:

- **Comprehensive institutional accountability** expands to include this Court's systematic participation in documented federal crime protection
- **Cross-jurisdictional pattern** analysis includes Texas federal court coordination
- **Academic documentation** expands to cover this Court's contribution to constitutional breakdown
- **National visibility** increases regarding systematic federal court corruption

D. The Practical Consideration

Your Honor, Plaintiff seeks justice, not institutional destruction. Constitutional governance through consistent law application eliminates the need for broader institutional accountability measures.

The offer is straightforward: Demonstrate that federal courts can apply mathematical reality and statutory law consistently, and institutional accountability efforts can focus on jurisdictions that have proven incapable of constitutional governance.

E. The Historical Opportunity

This Court can become:

- **The federal court** that restored mathematical reality to corporate liability analysis
- **The judge** who established that perjury has consequences regardless of defendant wealth
- **The precedent** proving constitutional governance remains possible in American jurisprudence

Or continue as:

- **The court** that protected mathematical impossibilities from legal analysis
- **The judge** who subordinated federal law to corporate contract terms
- **The precedent** confirming that justice is reserved for institutional defendants

F. The Time-Sensitive Nature of This Opportunity

Current Status: This Court's conduct remains characterized as systematic coordination rather than deliberate corruption, leaving opportunity for redemption through evidence-based ruling.

Window for Redemption: Narrowing daily as institutional accountability proceedings advance and cross-jurisdictional patterns receive academic documentation and federal oversight attention.

The Strategic Reality: Early restoration of constitutional governance through correct ruling eliminates need for continued institutional accountability measures regarding this Court's conduct.

G. The Straightforward Resolution

Your Honor, the path forward requires only:

1. **Application of basic mathematics** to documented impossibilities
2. **Recognition of perjury** through contradictory sworn statements
3. **Enforcement of statutory damages** for willful copyright infringement
4. **Referral of federal crimes** to appropriate prosecution authorities

These actions demonstrate competent judicial function and eliminate any basis for continued institutional accountability proceedings regarding this Court.

The choice is binary, the evidence is complete, and the opportunity for constitutional redemption through straightforward law application remains available.

XVIII. THE TIMING TEST THAT ELIMINATES ALL EXCUSES

A. The Timing Test That Eliminates All Excuses

Your Honor, this Motion presents questions so elementary that any delay in ruling proves coordination:

The Questions:

- Can impression counts decrease during billing periods? **NO** (basic math)
- Can corporations simultaneously know and not know their own systems? **NO** (basic logic)
- Does claiming ignorance of your own business constitute "otherwise defending"? **NO** (basic law)

Time Required to Answer: Minutes, not months

B. The Message to Corporate America

If This Motion Takes Weeks or Months to Decide:

The Signal Sent: "Give us enough time and we'll take care of it for you"

The Corporate Response: Every defendant will immediately adopt strategic amnesia, knowing federal courts will protect them with procedural delays while they destroy evidence and continue violations.

The Constitutional Destruction: Justice becomes a luxury service reserved for those who can afford judicial protection.

C. The Only Two Possible Explanations for Delay

Explanation #1: This Court is searching for ways to help Defendant escape obvious liability

- **Evidence:** Six months of protection through procedural manipulation
- **Result:** Judicial corruption documented in real-time

Explanation #2: This Court believes Defendant might still make valid arguments

- **Problem:** What argument could excuse systematic perjury and mathematical impossibilities?
- **Reality:** No innocent explanation exists for contradictory sworn statements

There is no Explanation #3.

D. The Federal Court Efficiency Test

Standard Default Motions: Decided within days when elements are clear **This Default Motion:** Elements are mathematically proven and undisputed

Any Delay: Proves systematic protection rather than legal complexity

The Precedent: If courts may delay obvious default judgments for months while defendants continue federal crimes, then procedural delay becomes institutionalized obstruction of justice.

E. The Real-Time Documentation of Judicial Response

Every Day of Delay Creates Evidence:

- This Court prioritizes corporate protection over federal law enforcement
- Mathematical reality is subordinated to institutional convenience
- Wealthy defendants enjoy immunity unavailable to individual plaintiffs
- Federal courts actively participate in ongoing criminal enterprises

F. The 24-Hour Standard for Elementary Questions

Your Honor, this Motion requires ruling within 24 hours because:

1. **Mathematical certainty** eliminates need for deliberation
2. **Six months of evidence** provides complete factual record
3. **Documented perjury** through contradictory Rule 11 certifications requires immediate response
4. **Ongoing federal crimes** demand urgent judicial intervention

Any delay beyond 24 hours proves this Court prioritizes corporate protection over constitutional enforcement.

G. The National Visibility Reality

This Case is Monitored By:

- Legal professionals nationwide through PACER alerts
- Academic researchers studying judicial corruption
- Constitutional scholars documenting institutional failure
- Federal investigators evaluating systematic coordination

Every hour of delay creates permanent evidence that federal courts protect billion-dollar fraud through procedural manipulation.

H. The Binary Ultimatum

Rule Within 24 Hours: Demonstrate judicial competency and constitutional fidelity

Continue Delay: Provide conclusive evidence of systematic coordination with corporate defendants to protect documented federal crimes

Your Honor, the mathematical impossibilities in this case eliminate judicial discretion. The evidence is undisputable. The law is clear. The only remaining question is whether this Court enforces federal law consistently or joins the documented conspiracy to protect institutional defendants.

The choice is binary. The evidence is complete. The time for decision is now.

WHEREFORE, PLAINTIFF RESPECTFULLY REQUESTS:

A. Default Judgment

1. Default Judgment against Defendant X Corp. on all claims pursuant to Federal Rule of Civil Procedure 55(a) for failure to otherwise defend through substantive legal arguments.

2. Summary Judgment pursuant to Federal Rule of Civil Procedure 56 based on no genuine dispute of material fact, as Defendant's claimed ignorance of their own business operations creates no factual dispute regarding Plaintiff's mathematical evidence.

B. Monetary Relief

3. Damages in the amount of **\$85,350,000**, consisting of:

- **\$75,000,000** in statutory damages under 17 U.S.C. § 504(c) for 500+ willful copyright infringements at maximum statutory rate
- **\$250,000** in treble damages under Texas Deceptive Trade Practices Act and Computer Fraud and Abuse Act for systematic billing fraud
- **\$100,000** for intentional infliction of emotional distress resulting from systematic harassment campaign
- **\$10,000,000** in punitive damages for documented federal crimes including perjury, obstruction of justice, and disability harassment

4. Pre-judgment and post-judgment interest at the maximum rate allowed by law.

5. Costs and expenses incurred in prosecuting this action.

C. Injunctive Relief

6. Permanent injunction requiring Defendant to:

- Immediately cease all use of Plaintiff's copyrighted materials
- Remove all infringing content from their platform within 24 hours
- Implement verified procedures preventing future infringement of Plaintiff's intellectual property
- Cease all retaliatory conduct against Plaintiff

D. Criminal Referrals

7. Criminal referral to the United States Attorney for the Western District of Texas for prosecution of:

- **Perjury** under 18 U.S.C. § 1621 (contradictory sworn statements under Rule 11)
- **Obstruction of justice** under 18 U.S.C. § 1503 (systematic litigation fraud)
- **Conspiracy against rights** under 18 U.S.C. § 241 (disability-based harassment and federal rights violations)

E. Sanctions and Professional Accountability

8. Rule 11 sanctions against Defendant and counsel for frivolous filings, false certifications, and systematic abuse of federal court procedures.

9. Professional discipline referral to appropriate state bar associations for counsel's participation in documented perjury and obstruction of federal proceedings.

F. Constitutional and Institutional Relief

10. Judicial finding that Defendant's conduct constitutes systematic violation of federal law warranting enhanced enforcement mechanisms.

11. Precedential ruling establishing that mathematical impossibilities constitute adequate proof of systematic fraud regardless of defendant's claimed ignorance of their own operations.

12. Order requiring immediate compliance with all outstanding accommodation requests under the Americans with Disabilities Act.

G. Additional and Alternative Relief

13. Such other and further relief as this Court deems just and proper to remedy Defendant's systematic violation of federal law and ensure accountability for documented institutional corruption.

14. Alternative relief in the event this Court declines to award maximum damages: minimum award of actual damages, attorney fees, and costs, with mandatory criminal referral for documented perjury.

H. Certification of Record

15. Order certifying that the complete record of this case, including all documented evidence of judicial delays, procedural manipulation, and institutional coordination, be forwarded to:

- The United States Attorney for criminal investigation
- The Judicial Conference of the United States for administrative review
- The House and Senate Judiciary Committees for oversight consideration
- The Department of Justice Civil Rights Division for federal civil rights enforcement

Plaintiff certifies that these requests are supported by documented evidence, mathematical proof, and Defendant's own admissions contained in the record of these proceedings.

RESPECTFULLY SUBMITTED,

JUSTIN RIDDLE

Pro Se Plaintiff

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Omaha, NE 68116

402-813-2156

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion has been served upon all parties through the Court's CM/ECF system, and that the entire legal community monitoring this case through PACER will observe this Court's response time as evidence of either constitutional governance or institutional corruption.

JUSTIN RIDDLE

Pro Se Plaintiff

DATE: July 28th, 2025